

# United States Department of the Interior Bureau of Land Management

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**Determination of NEPA Adequacy**  
**DOI-BLM-UT-Y202-2016-005-DNA**  
**October 2015**

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## **High Mountain Institute Indian Creek Commercial Guided Climbing Special Recreation Permit**

***Location:*** Indian Creek Special Recreation Area  
San Juan County, UT

***Applicant/Address:*** High Mountain Institute  
Chris Barlow  
PO Box 970  
Leadville, CO 80461

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Monticello Field Office  
365 N. Main St.  
Monticello, Utah 84534  
Phone: 435-587-1500  
Fax: 435-587-1518



## Worksheet

### Determination of NEPA Adequacy

U.S. Department of the Interior  
Utah Bureau of Land Management

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The signed CONCLUSION at the end of this worksheet is part of an interim step in the BLM's internal analysis process and does not constitute an appealable decision; however, it constitutes an administrative record to be provided as evidence in protest, appeals and legal procedures.

OFFICE: Monticello Field Office

PROJECT NUMBER: DOI-BLM-UT-Y202-2016-005-DNA

PROPOSED ACTION TITLE: Indian Creek Commercial Guided Climbing SRP for Four Walls

LOCATION/LEGAL DESCRIPTION: Indian Creek Special Recreation Area

APPLICANTS: High Mountain Institute, Chris Barlow, PO Box 970, Leadville, CO 80461

#### **A. Description of the Proposed Action and Any Applicable Mitigation Measures**

High Mountain Institute (HMI) proposed adding guided climbing in Indian Creek to their existing Special Recreation Permit (SRP) with the Monticello BLM. The current permit, MFO-15-001, expires 12/31/2020.

This permit would include all of the design features described in the Indian Creek Commercial Climbing Special Recreation Permits for Four Walls EA (DOI-BLM-UT-Y020-2014-024). HMI would be allocated a maximum of 25 user days during their first year of use, but user days could be increased to a total of 50 user days per year if at least 75% of allotted days were used in the first year. The primary activity taking place on BLM would be commercial guided climbing on approved routes on the following four walls in Indian Creek SRMA: Battle of the Bulge, Donnelly Canyon, Supercrack, and Blue Gramma. Guides will use existing infrastructure located at the Donnelly Canyon parking area for staging and will access climbing walls using only existing developed trails. Camping is limited to designated sites in Indian Creek at Bridger Jack Mesa, Creek Pasture Campground, Superbowl Campground, Hamburger Rock Campground, or Indian Creek Falls Group Site. Use could take place year-round.

The following stipulations/mitigation measures would be applied to the permit:

*Cultural Resource:* No climbing would occur over known structures, artifacts, petroglyphs or pictographs. The permit holder will be held legally and financially responsible for historical, archaeological, cultural, or ecological values damaged, destroyed, or removed by trip participants. Cultural artifacts located on the surface of an archaeological site or isolated artifacts are not to be disturbed. Moving or disturbing cultural artifacts from any location is a violation of federal law. Climbing guides will be provided with a list of closed routes based on cultural surveys.

*Wildlife:* To avoid disturbance to wildlife during the nesting season March 1- August 31, the following limitations apply during the season:

- No climbing will be allowed on any wall until the activity has been approved by a qualified BLM wildlife biologist. This approval will be contingent on the results of standard wildlife surveys conducted each spring. Climbing guides will be provided with a list of approved routes and closed walls each season.
- The permittee will not hike into Donnelly Canyon past the climbing wall one-half hour before or after sunrise or sunset.

*Monitoring:* Permittee must allow the BLM to accompany tours for monitoring purposes.

## **B. Land Use Plan (LUP) Conformance**

**LUP Name:** Monticello Field Office Record of Decision and Approved Resource Management Plan (RMP)

**Date Approved:** November 17, 2008

The proposed action has been determined to be in conformance with the terms and conditions of the Monticello Resource Management Plan (October, 2008) as required by 43 CFR 1610.5.

Monticello's RMP states the following:

- **REC-17** "Special Recreation Permits will be issued as a discretionary action as a means to help meet management objectives, contact visitor use, protect recreational and natural resources and provide for the health and safety of visitors." (page 91)
- **REC-18** "All SRPs will be contain standard stipulations appropriate for the type of activity and may include additional stipulations necessary to protect lands or resources, reduce user conflicts, or minimize health and safety concerns. (page 91)

## **C. Identify the applicable National Environmental Policy Act (NEPA) documents and other related documents that cover the proposed action.**

Indian Creek Corridor Plan, EA UT-090-00-47, BLM 2005

Indian Creek Commercial Climbing Special Recreation Permits for Four Walls, DOI-BLM-UT-Y020-2014-024, BLM 2015

## **D. NEPA Adequacy Criteria**

**1. Is the new proposed action a feature of, or essentially similar to, an alternative analyzed in the existing NEPA document(s)? Is the project within the same analysis area, or if the project location is different, are the geographic and resource conditions sufficiently similar to those analyzed in the existing NEPA document(s)? If there are differences, can you explain why they are not substantial?**

☒ Yes  
☐ No

Documentation of answer and explanation:

DOI-BLM-UT-Y020-2014-024, Chapter 4 evaluates the entire SRP program for commercial climbing guides, including a programmatic analysis of existing and projected use. HMI's application would bring the total number of climbing guides in the Monticello Field Office to 24, well within the projected 27 total outfitters analyzed in the EA. The Monticello RMP/EIS, Chapter 2, Table 2.1, page 2-44 gives the general policy for the issuance and management of Special Recreation Permits (SRPs), which is also analyzed in Chapter IV of the EIS. This proposed action is within the planning area of the EIS.

**2. Is the range of alternatives analyzed in the existing NEPA document(s) appropriate with respect to the new proposed action (or existing proposed action), given current environmental concerns, interests, and resource values?**

☒ Yes  
☐ No

Documentation of answer and explanation:

Two Action Alternatives and one No Action Alternative were analyzed in the EA document. The Proposed Action included maintaining all current use, as well as permitting new applicants at maximum requested use and allowing high use numbers for future applicants. Based on staff concerns, a second action alternative that limits allocated user days for new and future applicants was analyzed and ultimately selected. This range of alternatives is appropriate with respect to the current proposed action due to the noncontroversial nature of the action. Current environmental concerns, interest, resource values, and circumstances have not substantially changed and a new alternative is not needed.

**3. Is existing analysis adequate in light of any new information or circumstances (such as, rangeland health standards assessment; recent endangered species listings, updated list of BLM sensitive species)? Can you reasonably conclude that new information and new circumstances would not substantially change the analysis of the new proposed action?**

☒ Yes  
☐ No

Documentation of answer and explanation:

Yes; the existing analysis and conclusions are adequate as there has been no new information or circumstances presented that would substantially change the affected environment and environmental impacts than those addressed in the EA. It can be reasonably concluded that all new information and circumstances are insignificant with regard to analysis of the proposed action.

**4. Are the direct, indirect, and cumulative effects that would result from implementation of the new proposed action similar (both quantitatively and qualitatively) to those analyzed in the existing NEPA document?**

☒ Yes

\_\_\_No

Documentation of answer and explanation:

Yes; the direct and indirect impacts are substantially unchanged from those identified in the existing NEPA document. Yes; impacts analyzed in the EA are the same as those associated with the current proposed action.

**5. Are the public involvement and interagency review associated with existing NEPA document(s) adequate for the current proposed action?**

✓ Yes

\_\_\_No

The public involvement completed in the EIS is adequate for this proposed action.

Documentation and public involvement can be found in Chapter 5 of the EA. There is no new information or issues that would necessitate a new public scoping period.

**E. Persons/Agencies/BLM Staff Consulted:**

<u>Name</u>	<u>Title</u>	<u>Resource Represented</u>
Casey Worth	Recreation Planner	Areas of Critical Environmental Concern; Farmlands, Wild & Scenic Rivers, Environmental Justice, Wilderness/WSA and Lands with Wilderness Characteristics
Jeff Brown	Natural Resource Specialist	Wastes (hazardous or solid)
Cameron Cox	Archaeologist	Cultural Resources
Don Simonis	Archaeologist	Native American Religious Concerns
Jed Carling	Range Specialist	Invasive Species/Noxious Weeds; Wetlands/Riparian Zones; Floodplains; Farmlands
Mandy Scott	Wildlife Biologist	Threatened, Endangered, or Candidate Animal Species; Threatened, Endangered, or Candidate Plant Species; Migratory Birds; Fish and Wildlife
Cliff Giffen	Natural Resource Specialist	Air Quality Greenhouse gas emissions; Soils
Ted McDougall	Geologist	Mineral Resources/Energy Production

Paul Plemons	Fuels Specialist	Fuels/ Fire Management
Rebecca Hunt-Foster	Paleontologist	Paleontological Resources

## **CONCLUSION**

### **Plan Conformance:**

- ✓ This proposal conforms to the applicable land use plan.
- NA This proposal does not conform to the applicable land use plan

### **Determination of NEPA Adequacy**

- ✓ Based on the review documented above, I conclude that this proposal conforms to the applicable land use plan and that the NEPA documentation fully covers the proposed action and constitutes BLM's compliance with the requirements of the NEPA.
- NA The existing NEPA documentation does not fully cover the proposed action. Additional NEPA documentation is needed if the project is to be further considered.

/s/ Misti Haines  
Signature of Project Lead

12/17/2015  
Date

/s/ Brian T. Quigley  
Signature of NEPA Coordinator

12/17/2015  
Date

/s/ Donald K. Hoffheins  
Signature of the Responsible Official

12/17/2015  
Date

**Note:** The signed Conclusion on this Worksheet is part of an interim step in the BLM's internal decision process and does not constitute an appealable decision. However, the lease, permit, or other authorization based on this DNA is subject to protest or appeal under 43 CFR Part 4 and the program-specific regulations.

### **ATTACHMENTS:**

- **ID Team Checklist**
- **2014 Commercial SRP Stipulations with Indian Creek SRMA**  
(most recent version, applies to 2016)